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*Attorneys for Defendants Charlotte Danielson,
Outcome Associates, Inc. and The Danielson Group, LLC*

Of Counsel:

Steven G. Storch (admitted *pro hac vice*)
Edward P. Dolido (admitted *pro hac vice*)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

EDUCATIONAL IMPACT, INC.

Plaintiff,

v.

CHARLOTTE DANIELSON
12 Gordon Way
Princeton, NJ 08540

and

OUTCOMES ASSOCIATES, INC.
12 Gordon Way
Princeton, NJ 08540

and

THE DANIELSON GROUP LLC
12 Gordon Way
Princeton, NJ 08540

and

TEACHSCAPE, INC.
71 Stevenson Street
5th Floor
San Francisco, CA 94105

Defendants.

CIVIL ACTION

DOCKET NO.: 3:14-CV-00937-FLW-LHG

Motion Date: July 21, 2014

(Oral Argument is Requested)

**NOTICE OF MOTION OF
THE DANIELSON DEFENDANTS
TO DISMISS PLAINTIFF'S FIRST
AMENDED COMPLAINT**

To: Alan L. Frank, Esq.
ALAN L. FRANK LAW
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Joseph B. Fiorenzo, Esq.
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-and-
Ronald S. Wynn, Esq.
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425 Market Street, 26th Floor
San Francisco, CA 94105
Attorneys for Defendant Teachscape, Inc.

PLEASE TAKE NOTICE that on July 21, 2014, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned counsel for Defendants Charlotte Danielson, Outcomes Associates, Inc. and The Danielson Group, LLC (collectively, the “Danielson Defendants”), shall move before the Honorable Freda L. Wolfson, at Room 5E of the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for the entry of an Order dismissing Plaintiff’s First Amended Complaint as against them pursuant to Fed. R. Civ. P. 12(b)(6) on the ground that it fails to state a claim upon which relief can be granted.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the Danielson Defendants shall rely upon the accompanying (1) Danielson Defendants’ Memorandum of Law in Support of Their Motion to Dismiss the First Amended Complaint as Against Them; (2) Certification of Lita Beth Wright, Esq., dated June 20, 2014, and exhibits 1 through 3 thereto (including the First Amended Complaint herein together with its exhibits); and (3) proposed order.

PLEASE TAKE FURTHER NOTICE that opposing papers, if any, are to be served and filed on or before July 7, 2014. Oral argument of the motion is requested.

Dated: June 20, 2014

STORCH AMINI & MUNVES PC
*Attorneys for Defendants Charlotte Danielson
Outcome Associates, Inc. and The Danielson Group, LLC*

By: s/ Lita Beth Wright
Lita Beth Wright